

# SINHA LAW

OCT 10 2017

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October 2, 2017

Via Hand Delivery

Lester Pinto, General Manager  
Mike Selvog, EHS Manager  
TTM Technologies, Inc. – Santa Clara Division  
407 Mathew Street  
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Via US Mail

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Sacramento, CA 95833

**Re: 60-Day Notice of Violations and Intent to File Suit Under the Federal Water  
Pollution Control Act (“Clean Water Act”)**

To Officers, Directors, Operators, Property Owners and/or Facility Managers of TTM Technologies, Inc. – Santa Clara Division:

The California Environmental Protection Association (“CEPA”) provides this 60-day Notice of violations of the Federal Clean Water Act (“CWA” or “Act”) 33 U.S.C. § 1251 *et seq.*, that CEPA believes are occurring at the TTM Technologies, Inc. facility located at 407 Mathew Street in Santa Clara, California (“the Facility” or “the site”). Pursuant to CWA §505(b) (33 U.S.C. §1365(a)), this 60-day Notice of violations (“Notice”) is being sent to you as the responsible property owners, officers, operators or managers of the Facility, as well as to the U.S. Environmental Protection Agency (“EPA”), the U.S. Attorney General, the California State Water Resources Control Board (“SWRCB”), and the California San Francisco Bay Regional Water Quality Control Board (“RWQCB”).

CEPA is an environmental citizen’s group established under the laws of the State of California to protect, enhance, and assist in the restoration of all rivers, creeks, streams, wetlands, vernal pools, and tributaries of California.

This Notice addresses the violations of the CWA and the terms of California's Statewide General Permit for Dischargers of Storm Water for Industrial Activities ("General Permit") arising from the unlawful discharge of pollutants from the Facility into the San Francisco Bay, by way of the Guadalupe River.

TTM Technologies, Inc. – Santa Clara (the "Discharger") is hereby placed on formal notice by CEPA that after the expiration of sixty (60) days from the date this Notice was delivered, CEPA will be entitled to bring suit in the United States District Court against the Discharger for continuing violations of an effluent standard or limitation, National Pollutant Discharge Elimination System ("NPDES") permit condition or requirement, or Federal or State Order issued under the CWA (in particular, but not limited to, § 301(a), § 402(p), and § 505(a)(1)), as well as the failure to comply with requirements set forth in the Code of Federal Regulations and the San Francisco Bay RWQCB Water Quality Control Plan or "Basin Plan".

## **I. THE SPECIFIC STANDARD, LIMITATION, OR ORDER VIOLATED**

The Discharger filed a Notice of Intent ("NOI") on June 9, 2015, with respect to the Facility, agreeing to comply with the terms and conditions of the General Permit. The SWRCB approved the NOI, and the Discharger was assigned Waste Discharger Identification ("WDID") number 2 43I020717.

However, in its operations of the Facility, the Discharger has failed and is failing to comply with specific terms and conditions of the General Permit as described in Section II below. These violations are continuing in nature. Violations of the General Permit are violations of the CWA, specifically CWA § 301(a) and CWA § 402(p). Therefore, the Discharger has committed ongoing violations of the substantive and procedural requirements of CWA § 402(p) and of NPDES Permit No. CAS000001, State Water Resources Control Board Order 2014-0057-DWQ (the "General Permit") relating to industrial activities at the Facility.

## **II. VIOLATIONS OF THE CLEAN WATER ACT AND GENERAL PERMIT**

### **A. Facility Operations**

TTM Technologies, Inc. – Santa Clara is a printed circuit board ("PCB") manufacturing facility. Site operations are covered under Standard Industrial Code ("SIC") 3672, (Printed Circuit Board Manufacturing).

Site operations take place on a site that slopes towards storm drains which eventually enter the navigable waters of the Guadalupe River, which eventually drains into the San Francisco Bay, all of which are in proximity to the Facility. Because the real property on which the Facility is located is subject to rain events, the range of pollutants discharged from the Facility and identified in this Notice can discharge to the Guadalupe River.

**B. TTM Technologies, Inc. – Santa Clara’s Specific Violations**

**1. *Deficient BMP Implementation***

Sections I.C, V.A and X.C.1.b of the General Permit require Dischargers to identify and implement minimum and advanced Best Management Practices (“BMPs”) that comply with the Best Available Technology (“BAT”) and Best Conventional Pollutant Control Technology (“BCT”) requirements of the General Permit to reduce or prevent discharges of pollutants in their storm water discharge in a manner that reflects best industry practice considering technological availability and economic practicability and achievability.

TTM Technologies, Inc. – Santa Clara has violated and continues to violate the terms and conditions of the General Permit by failing to implement minimum and/or advanced BMPs that utilize BAT and BCT to control the discharge of pollutants in storm water at the Facility.

On July 1, 2016, the Discharger was accelerated to Level 1 Status pursuant to Section XII.C of the General Permit, for exceedances of total Copper, total Zinc, Chemical Oxygen Demand (COD), and pH. Pursuant to the General Permit, the Facility was evaluated, and a Level 1 Exceedance Response Evaluation Report was completed and certified on December 28, 2016.

The December 2016 evaluation completed by Fuss & O’Neil noted the following deficiencies in BMP implementation at the site:

1. Good Housekeeping: *Weekly and as-needed vacuum sweeping of outside areas exposed to storm water to address dust and particulate deposition. Prompt closing of bins, dumpsters and roll off containers. Cover exposed drums with water resistant material prior to rain event.*
2. Preventative Equipment Maintenance: *Vehicles and equipment will be inspected for leaks on a daily informal basis. Any leaks will be cleaned immediately. Galvanized equipment surfaces will be maintained and inspected by maintenance personnel to ensure surfaces are clean and intact.*
3. Material Handling and Storage: *Employees will inspect and clean areas immediately following material off-loading (for example, the bag house dust drums).*
4. Spill and Leak Response and Prevention
5. Secondary Containment

On July 1, 2017, the Discharger was accelerated to Level 2 Status pursuant to Section XII.D of the General Permit which provides as follows: "A Discharger's Level 1 status for any given parameter shall change to Level 2 status if sampling results indicate an NAL exceedance for that same parameter while the Discharger is in Level 1." The acceleration to Level 2 status was precipitated by average levels of Copper, Zinc, and COD from the Discharger's sampling results taken during Fiscal Year 2016-2017; specifically, on October 28, 2016 and June 12, 2017. Furthermore, the Discharger was elevated to Level 1 Status for Fiscal Year 2016-2017 for Nitrite + Nitrate Nitrogen. (See Section 4 below)

The Discharger's continued exceedances are further evidence of its failure to correct its BMP deficiencies and to follow the recommendations in its Level 1 ERA Evaluation Report.

*2. Failure to Collect and Analyze Storm Water Samples Pursuant to the General Permit*

The Discharger has failed to provide the RWQCB with the minimum number of annual documented results of Facility run-off sampling as required under Sections XI.B.2 and XI.B.11.a of Order No. 2014-0057-DWQ, in violation of the General Permit and the CWA.

Section XI.B.2 of the General Permit requires that all Dischargers collect and analyze storm water samples from two Qualifying Storm Events ("QSEs") within the first half of each reporting year (July 1 to December 31), and two (2) QSEs within the second half of each reporting year (January 1 to June 30).

A Qualifying Storm Event (QSE) is a precipitation event that produces a discharge for at least one drainage area and is preceded by 48 hours with no discharge from any drainage area.

Furthermore, Section XI.B.11.a requires Dischargers to submit all sampling and analytical results for all individual or Qualified Combined Samples via SMARTS within 30 days of obtaining all results for each sampling event. Section XI.C.6.b provides that if samples are not collected pursuant to the General Permit an explanation must be included in the Annual Report.

As of the date of this Notice, the Discharger has failed to upload into the SMARTS database system:

- a. One storm water sample analysis for the time period July 1, 2015, through December 31, 2015 (one sample analysis was uploaded dated 11/2/15). Qualified Storm Events occurred in the vicinity of the Facility on at least the following relevant dates: 11/2/15, 11/9/15, 11/15/15, 12/13/15, 12-21-15, and 12/24/15.

- b. Two storm water sample analyses for the time period January 1, 2016, through June 30, 2016. Qualified Storm Events occurred in the vicinity of the Facility on at least the following relevant dates: 1/5/16, 1/22/16, 3/4/16, 3/13/16, 4/8/16, and 4/22/16.
- c. One storm water sample analysis for the time period July 1, 2016, through December 31, 2016 (one sample analysis was uploaded dated 10/28/16). Qualified Storm Events occurred in the vicinity of the Facility on at least the following relevant dates: 10/16/16, 10/27/16, 10/30/16, 11/20/16, 11/26/16, 12/10/16, 12/15/16, and 12/23/16; and
- d. One storm water sample analysis for the time period January 1, 2017, through June 30, 2017 (one sample analysis was uploaded dated 6/2/17). Qualified Storm Events occurred in the vicinity of the Facility on at least the following relevant dates: 1/3/17, 1/7/17, 1/18/17, 1/22/17, 2/2/17, 2/9/17, 2/17/17, 2/20/17, 3/4/17, 3/20/17, 3/24/17, 4/6/17, 4/13/17 and 4/16/17.

Further, the Discharger has not applied for or received a No Exposure Certification (NEC) for the Facility, pursuant to Section XVII, which provides as follows:

**XVII. CONDITIONAL EXCLUSION - NO EXPOSURE CERTIFICATION (NEC)**

A. Discharges composed entirely of storm water that has not been exposed to industrial activity are not industrial storm water discharges. Dischargers are conditionally excluded from complying with the SWPPP and monitoring requirements of this General Permit if all of the following conditions are met:

- 1. There is no exposure of Industrial Materials and Activities to rain, snow, snowmelt, and/or runoff;
  - 2. All unauthorized NSWDS have been eliminated and all authorized NSWDS meet the conditions of Section IV;
  - 3. The Discharger has certified and submitted via SMARTS PRDs for NEC coverage pursuant to the instructions in Section II.B.2; and,
  - 4. The Discharger has satisfied all other requirements of this Section.
3. *Falsification of Annual Reports Submitted to the RWQCB*

Section XXII.L of the General Permit provides as follows:

#### **L. Certification**

Any person signing, certifying, and submitting documents under Section XXI.K above shall make the following certification:

"I certify under penalty of law that this document and all Attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, to the best of my knowledge and belief, the information submitted is, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Further, Section XXI.N of the General Permit provides as follows:

#### **N. Penalties for Falsification of Reports**

Clean Water Act section 309(c)(4) provides that any person that knowingly makes any false material statement, representation, or certification in any record or other document submitted or required to be maintained under this General Permit, including reports of compliance or noncompliance shall upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment for not more than two years or by both.

On June 27, 2017, the Discharger submitted its Annual Report for the Fiscal Year 2016-2017. This Report was signed under penalty of law by Mike Selvog, the Legally Responsible Party for the Facility as designated in the Discharger's Storm Water Pollution Prevention Plan (SWPPP).

The Facility's Annual Report for fiscal year 2016-2017 included Attachment 1 as an explanation for why the Discharger failed to sample the required number of Qualifying Storm Events during the reporting year for all discharge locations, in accordance with Section XI.B. Mr. Selvog certified in Attachment 1 to the Annual Report, under penalty of perjury, that between July 1, 2016 and June 30, 2017 **"Only sampled 2 total events for 2016-2017. One event in October 2016 and one event in June 2017. Other rain events did not meet the sampling criteria."**

Government records from the National Oceanic and Atmospheric Administration (NOAA) website/database confirm that during the fiscal year 2016-2017, at least 22 Qualified Storm Events (QSEs) occurred near the Facility. Furthermore, the Discharger uploaded a sample analysis on June 20, 2017, that had been collected on June 9, 2017. The rainfall in the area that date was only a negligible .02". All 22 of the QSEs that occurred in the area during the Fiscal Year 2016-17



were 22 to 50 times the amount of rainfall that caused a discharge in the Facility's outfalls such that a storm water run-off sample was able to be collected from each of the Facility's outfalls.

Based on the foregoing, it is undisputed that the 2016-2017 fiscal year included many significant recorded rain events that qualified as official storm events pursuant to the General Permit. Notwithstanding those facts, the Discharger asserted in its Annual Report for the fiscal year 2016-2017 that there were insufficient QSEs during that time period. Mr. Selvog, as the Legally Responsible Party for the Discharger, knew or should have known that the assertion that there were insufficient QSEs during the fiscal year 2016-2017 was a false statement.

*4. Discharges in Violation of the General Permit*

Section 402(p) of the Clean Water Act prohibits the discharge of storm water associated with industrial activities, except as permitted under an NPDES permit such as the General Permit. 33 U.S.C. § 1342. Sections I.C.27 and III.A and B of the General Permit prohibit the discharge of materials other than storm water (defined as non-storm water discharges) that discharge either directly or indirectly to waters of the United States. Section XXI.A of the General Permit requires Dischargers to comply with effluent standards or prohibitions established under section CWA 307(a) for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions.

Sections III and VI of the General Permit prohibit storm water discharges and authorized non-storm water discharges to surface or groundwater that adversely impact human health or the environment; cause or threaten to cause pollution, contamination, or nuisance; cause or contribute to an exceedance of any applicable water quality standards in any affected receiving water; violate any discharge prohibitions contained in applicable Regional Water Board Water Quality Control Plans (Basin Plans) or statewide water quality control plans and policies; or contain hazardous substances equal to or in excess of a reportable quantity listed in 40 Code of Federal Regulations sections 110.6, 117.21, or 302.6.

TTM Technologies, Inc. – Santa Clara's sampling and analysis results reported to the RWQCB confirm discharges of specific pollutants and materials other than storm water, in violation of the General Permit provisions listed above. Self-monitoring reports under the General Permit are deemed "conclusive evidence of an exceedance of a permit limitation." *Sierra Club v. Union Oil*, 813 F.2d 1480, 1492 (9th Cir. 1988).

Table 2 of the General Permit (TABLE 2: *Parameter NAL Values, Test Methods, and Reporting Units*) outlines specific Annual and Instantaneous Numeric Action Levels ("NALs) for common parameters. A copy of Table 2 is included with this Notice.

TTM Technologies, Inc. – Santa Clara’s storm water analyses as indicated below contained levels for tested parameters in excess of Annual or Instantaneous NAL levels. The discharges of pollutants from the Facility have violated Discharge Prohibitions and Receiving Water Limitations of the General Permit and are evidence of ongoing violations of Effluent Limitations.

<b>Date of Sample Collection</b>	<b>Drainage Collection Point</b>	<b>Parameter</b>	<b>Concentration in Discharge (mg/L)</b>	<b>NAL Annual Average / Instantaneous Value (mg/L)</b>
11/20/2014	345	Copper	1.00	0.0332
11/20/2014	359/353	Copper	1.30	0.0332
11/20/2014	377/359	Copper	1.60	0.0332
11/20/2014	393/377	Copper	2.30	0.0332
02/06/2015	345	Copper	0.24	0.0332
02/06/2015	359/353	Copper	3.10	0.0332
02/06/2015	377/359	Copper	0.95	0.0332
02/06/2015	393/377	Copper	0.19	0.0332
11/02/2015	345	Copper	1.80	0.0332
11/02/2015	359/353	Copper	0.66	0.0332
11/02/2015	377/359	Copper	0.79	0.0332
11/02/2015	393/377	Copper	0.40	0.0332
11/02/2015	345	Zinc	3.30	0.26
11/02/2015	359/353	Zinc	1.80	0.26
11/02/2015	377/359	Zinc	2.00	0.26
11/02/2015	393/377	Zinc	0.73	0.26
11/02/2015	345	C.O.D	220	120
11/02/2015	359/353	C.O.D	200	120
11/02/2015	377/359	C.O.D	200	120
11/02/2015	393/377	C.O.D	80	120
11/02/2015	345	pH	4.0	<6.0, >9.0
11/02/2015	359/353	pH	4.0	<6.0, >9.0
11/02/2015	377/359	pH	4.0	<6.0, >9.0
11/02/2015	393/377	pH	4.0	<6.0, >9.0
10/28/2016	345	Copper	0.51	0.0332
10/28/2016	359/353	Copper	1.50	0.0332
10/28/2016	377/359	Copper	0.38	0.0332
10/28/2016	393/377	Copper	0.29	0.0332
10/28/2016	345	Zinc	1.50	0.26
10/28/2016	359/353	Zinc	1.10	0.26
10/28/2016	377/359	Zinc	2.0	0.26
10/28/2016	393/377	Zinc	No Sample Reported	0.26



Date of Sample Collection	Drainage Collection Point	Parameter	Concentration in Discharge (mg/L)	NAL Annual Average / Instantaneous Value (mg/L)
10/28/2016	345	C.O.D	28	120
10/28/2016	359/353	C.O.D	47	120
10/28/2016	377/359	C.O.D	35	120
10/28/2016	393/377	C.O.D	15	120
10/28/2016	359/353	pH	5.7	<6.0, >9.0
10/28/2016	345	NO3 + NO2 as N	0.532	0.68
10/28/2016	359/353	NO3 + NO2 as N	1.88	0.68
10/28/2016	377/359	NO3 + NO2 as N	0.737	0.68
10/28/2016	393/377	NO3 + NO2 as N	0.421	0.68
06/12/2017	345	Copper	4.1	0.0332
06/12/2017	359/353	Copper	4.2	0.0332
06/12/2017	377/359	Copper	3.4	0.0332
06/12/2017	393/377	Copper	3.2	0.0332
06/12/2017	345	Zinc	2.4	0.26
06/12/2017	359/353	Zinc	2.5	0.26
06/12/2017	377/359	Zinc	1.8	0.26
06/12/2017	393/377	Zinc	1.7	0.26
06/12/2017	345	C.O.D	146	120
06/12/2017	359/353	C.O.D	152	120
06/12/2017	377/359	C.O.D	291	120
06/12/2017	393/377	C.O.D	722	120
06/12/2017	345	NO3 + NO2 as N	6.69	0.68
06/12/2017	359/353	NO3 + NO2 as N	6.64	0.68
06/12/2017	377/359	NO3 + NO2 as N	4.75	0.68
06/12/2017	393/377	NO3 + NO2 as N	4.87	0.68

The Discharger may have had other violations that can only be fully identified and documented once discovery and investigation have been completed. Hence, to the extent possible, CEPA includes such violations in this Notice and reserves the right to amend this Notice, if necessary, to include such further violations in future legal proceedings.

The violations discussed herein are derived from eye witness reports and records publicly available. These violations are continuing.

The Facility is located near the Guadalupe River, which is a tributary of the San Francisco Bay – all waters of the United States. The Guadalupe River is listed under the CWA as impaired for Metals. The San Francisco Bay is listed under the CWA as impaired for Pathogens (Indicator Bacteria), Metals (Mercury, Zinc), and Sediment (Siltation). Receiving water concerns for the Facility are nitrogen, zinc, aluminum, lead, copper, cadmium, chemical oxygen demand, and sediment. All illegal discharges and activities described in this Notice occur in close proximity to the above-identified waters. During storm events, the discharges are highly likely to discharge to said waters.

The RWQCB has determined that the watershed areas and affected waterways identified in this Notice are beneficially used for: water contact recreation, non-contact water recreation, fish and wildlife habitat, preservation of rare and endangered species, fish migration, fish spawning, navigation, and sport fishing. Information available to CEPA indicates the continuation of unlawful discharges of pollutants from the Facility into waters of the United States, specifically the Guadalupe River and the San Francisco Bay, in violation of the General Permit and the CWA. CEPA is informed and believes, and on such information and belief alleges, that these illegal discharges will continue to harm beneficial uses of the above-identified waters until the Discharger corrects the violations outlined in this Notice.

### **III. THE PERSON OR PERSONS RESPONSIBLE FOR THE VIOLATIONS**

The entity responsible for the alleged violations is TTM Technologies, Inc. – Santa Clara (“the Discharger”), including its parent companies, owners, operators and employees responsible for compliance with the CWA.

### **IV. THE LOCATION OF THE VIOLATIONS**

The location of the point sources from which the pollutants identified in this Notice are discharged in violation of the CWA is TTM Technologies, Inc. – Santa Clara’s permanent facility address of 407 Mathew Street in Santa Clara, California, and includes the adjoining navigable waters of the Guadalupe River, and San Francisco Bay respectively - both waters of the United States.

### **V. THE DATE, DATES, OR REASONABLE RANGE OF DATES OF THE VIOLATIONS**

The range of dates covered by this 60-day Notice is from at least January 13, 2016, to the date of this Notice. CEPA may from time to time update this Notice to include all violations which may occur after the range of dates covered by this Notice. Some of the violations are continuous in nature; therefore, each day constitutes a violation.

## **VI. CONTACT INFORMATION**

The entity giving this 60-day Notice is the California Environmental Protection Association ("CEPA").

To ensure proper response to this Notice, all communications should be addressed as follows:

*Xhavin Sinha, Attorney for*  
*CALIFORNIA ENVIRONMENTAL PROTECTION ASSOCIATION*  
*1645 Willow Street, #150*  
*San Jose, CA 95125*  
*Telephone: (408) 791-0432*  
*Email: [xsinha@sinha-law.com](mailto:xsinha@sinha-law.com)*

## **VII. PENALTIES**

The violations set forth in this Notice affect the health and enjoyment of members of CEPA who reside near and recreate in the Guadalupe River, and the San Francisco Bay. Members of CEPA use the Guadalupe River, and the San Francisco Bay for recreation, sports, fishing, swimming, hiking, photography, nature walks and the like. Their health, use and enjoyment of this natural resource is specifically impaired by the Discharger's violations of the CWA as set forth in this Notice.

CWA §§ 505(a)(1) and 505(f) provide for citizen enforcement actions against any "person," including individuals, corporations, or partnerships, for violations of NPDES permit requirements and for un-permitted discharges of pollutants. 33 U.S.C. §§ 1365(a)(1) and (f), §1362(5). An action for injunctive relief under the CWA is authorized by 33 U.S.C. §1365(a). Violators of the Act are also subject to an assessment of civil penalties of up to \$37,500 per day/per violation for all violations pursuant to Sections 309(d) and 505 of the Act, 33 U.S.C. §§ 1319(d), 1365. See also 40 C.F.R. §§ 19.1-19.4.

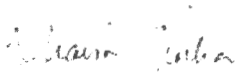
CEPA believes this Notice sufficiently states grounds for filing suit in federal court under the "citizen suit" provisions of CWA to obtain the relief provided for under the law.

### **VIII. CONCLUSION**

The CWA specifically provides a 60-day notice period to promote resolution of disputes. CEPA encourages the Discharger and/or its counsel to contact CEPA or its counsel within 20 days of receipt of this Notice to initiate a discussion regarding the violations detailed herein.

During the 60-day notice period, CEPA is willing to discuss effective remedies for the violations, however, if the Discharger wishes to pursue such discussions in the absence of litigation, it is suggested those discussions be initiated soon so that they may be completed before the end of the 60-day notice period. CEPA reserves the right to file a lawsuit if discussions are continuing when the notice period ends.

Very truly yours,



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Xhavin Sinha  
Attorney for CALIFORNIA ENVIRONMENTAL PROTECTION ASSOCIATION

Enclosure

TABLE 2 – Parameter NAL Values, Test Methods and Reporting Units

**SINHA**  
**LAW**

60-Day Notice of Intent to Sue  
October 2, 2017  
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Copies to:

Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Executive Director  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

Jeff Sessions, U.S. Attorney General  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, DC 20530-0001

Regional Administrator  
U.S. EPA – Region 9  
75 Hawthorne Street  
San Francisco, CA, 94105

Executive Officer  
San Francisco Bay Regional Water Quality Control Board  
1515 Clay St # 1400  
Oakland, CA 94612



**TABLE 2: Parameter NAL Values, Test Methods, and Reporting Units**

PARAMETER	TEST METHOD	REPORTING UNITS	ANNUAL NAL	INSTANTANEOUS MAXIMUM NAL
pH*	See Section XI.C.2	pH units	N/A	Less than 6.0 Greater than 9.0
Suspended Solids (TSS)*, Total	SM 2540-D	mg/L	100	400
Oil & Grease (O&G)*, Total	EPA 1664A	mg/L	15	25
Zinc, Total (H)	EPA 200.8	mg/L	0.26**	
Copper, Total (H)	EPA 200.8	mg/L	0.0332**	
Cyanide, Total	SM 4500-CN C, D, or E	mg/L	0.022	
Lead, Total (H)	EPA 200.8	mg/L	0.262**	
Chemical Oxygen Demand (COD)	SM 5220C	mg/L	120	
Aluminum, Total	EPA 200.8	mg/L	0.75	
Iron, Total	EPA 200.7	mg/L	1.0	
Nitrate + Nitrite Nitrogen	SM 4500-NO3- E	mg/L as N	0.68	
Total Phosphorus	SM 4500-P B+E	mg/L as P	2.0	
Ammonia (as N)	SM 4500-NH3 B+ C or E	mg/L	2.14	
Magnesium, total	EPA 200.7	mg/L	0.064	
Arsenic, Total (c)	EPA 200.8	mg/L	0.15	
Cadmium, Total (H)	EPA 200.8	mg/L	0.0053**	
Nickel, Total (H)	EPA 200.8	mg/l	1.02**	
Mercury, Total	EPA 245.1	mg/L	0.0014	
Selenium, Total	EPA 200.8	mg/L	0.005	
Silver, Total (H)	EPA 200.8	mg/L	0.0183**	
Biochemical Oxygen Demand (BOD)	SM 5210B	mg/L	30	

SM – Standard Methods for the Examination of Water and Wastewater, 18<sup>th</sup> edition

EPA – U.S. EPA test methods

(H) – Hardness dependent

\* Minimum parameters required by this General Permit

\*\*The NAL is the highest value used by U.S. EPA based on their hardness table in the 2008 MSGP.